

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

No. 2:21-cv-00563-JCC

**STIPULATED MOTION AND  
(PROPOSED) ORDER RE: MOTIONS  
TO SEAL**

**NOTE ON MOTION CALENDAR:  
JUNE 27, 2024**

The Parties have met and conferred to discuss the party and third-party motions to seal Valve's Opposition to Plaintiffs' Motion for Class Certification and the evidence and declarations on which Valve relies, Valve's *Daubert* Motion, and the Schwartz Expert Report (Exhibit 1 to Declaration of Alicia Cobb, Dkt. # 182-1). Pursuant to the Court's May 16, 2024 Stipulated Order, Dkt. 228, the deadline for the parties to file versions redacting all the materials sought to be sealed by any party or nonparty of the Schwartz Report, Valve's Opposition to Plaintiffs' Motion for Class Certification and the evidence and declarations on which Valve

STIPULATED MOTION AND ORDER RE: MOTIONS TO  
SEAL – 1

**CORR CRONIN LLP**  
1015 Second Avenue, Floor 10  
Seattle, Washington 98104-1001  
Tel (206) 625-8600  
Fax (206) 625-0900

1 relies, and Valve’s Daubert Motion (collectively, “Public Redacted Versions”) is June 27, 2024.  
2 Because of uncertainty as to third-party motions to seal being filed and the extent to which third  
3 parties seek redactions or sealing, the high volume of proposed redactions by the Parties and  
4 third-parties, and the importance of avoiding inadvertent disclosure of “Confidential” or  
5 “Highly Confidential Attorneys’ Eyes Only” materials when preparing Public Redacted  
6 Versions, the Parties respectfully request additional time to prepare and file the Public Redacted  
7 Versions.

8 The Parties therefore stipulate and agree as follows:

- 9 1. The deadline for the Parties to file Public Redacted Versions is July 11, 2024.
- 10 2. By July 8, 2024, Valve will provide to Plaintiffs a proposed version of the  
11 Schwartz Expert Report (including all attachments) that redacts all materials  
12 sought to be sealed by Valve, Plaintiffs, and any third party. Thereafter, the  
13 Parties shall meet and confer prior to filing if Plaintiffs disagree with filing the  
14 version provided by Valve.
- 15 3. Plaintiffs shall file the redacted public version of the Schwartz Expert Report  
16 (including all attachments).
- 17 4. Valve shall file the redacted public version of Valve’s Opposition to Plaintiffs’  
18 Motion for Class Certification and the evidence and declarations on which Valve  
19 relies, and Valve’s Daubert Motion.

20  
21  
22  
23  
24  
25  
STIPULATED MOTION AND ORDER RE: MOTIONS TO  
SEAL – 2

**CORR CRONIN LLP**  
1015 Second Avenue, Floor 10  
Seattle, Washington 98104-1001  
Tel (206) 625-8600  
Fax (206) 625-0900

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 27th day of June, 2024.

*s/ Alicia Cobb*

Alicia Cobb, WSBA #48685  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
1109 First Avenue, Suite 210  
Seattle, Washington 98101  
Phone (206) 905-7000  
Fax (206) 905-7100  
aliciacobb@quinnemanuel.com

Steig D. Olson (*pro hac vice*)  
David LeRay (*pro hac vice*)  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
51 Madison Avenue  
New York, New York 10010  
Phone (212) 849-7231  
Fax (212) 849-7100  
steigolson@quinnemanuel.com

Adam Wolfson (*pro hac vice*)  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
865 S. Figueroa St., 10th Floor  
Los Angeles, California 90017  
Phone (213) 443-3285  
Fax (213) 443-3100  
adamwolfson@quinnemanuel.com

Charles Stevens (*pro hac vice*)  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
50 California St., 22nd Floor  
San Francisco, CA 94111  
Phone (415) 875-6600  
Fax (415) 875-6700  
charliestevens@quinnemanuel.com

*s/ Tyre L. Tindall*

Tyre L. Tindall, WSBA No. 56357  
Stephanie L. Jensen, WSBA #42042  
WILSON SONSINI GOODRICH &  
ROSATI P.C.  
701 Fifth Avenue, Suite 5100  
Seattle, WA 98104-7036  
Phone (206) 883-2500  
Fax (206) 883-2699  
ttindall@wsgr.com  
sjensen@wsgr.com

Kenneth R. O'Rourke (*pro hac vice*)  
Jordanne M. Steiner (*pro hac vice*)  
WILSON SONSINI GOODRICH &  
ROSATI, P.C.  
1700 K Street, NW, Suite 500  
Washington, DC 20006  
Phone (202) 973-8800  
Fax (202) 973-8899  
korourke@wsgr.com  
jordanne.miller@wsgr.com

W. Joseph Bruckner (*pro hac vice*)  
Joseph C. Bourne (*pro hac vice*)  
LOCKRIDGE GRINDAL NAUEN P.L.L.P.  
100 Washington Avenue S, Suite 2200  
Minneapolis, MN 55401  
Phone: (612) 339-6900  
Fax: (612) 339-0981  
wjbruckner@locklaw.com  
jcbourne@locklaw.com

*Proposed Interim Co-Lead Counsel*

STIPULATED MOTION AND ORDER RE: MOTIONS TO  
SEAL – 3

**CORR CRONIN LLP**  
1015 Second Avenue, Floor 10  
Seattle, Washington 98104-1001  
Tel (206) 625-8600  
Fax (206) 625-0900

Ankur Kapoor (*pro hac vice*)  
 Noah Brecker-Redd (*pro hac vice*)  
 CONSTANTINE CANNON LLP  
 335 Madison Avenue, 9th Floor  
 New York, NY 10017  
 Phone (212) 350-2700  
 Fax (212) 350-2701  
 akapoor@constantinecannon.com

Wyatt Fore (*pro hac vice*)  
 CONSTANTINE CANNON LLP  
 1001 Pennsylvania Ave., 22nd Floor  
 Washington, D.C. 20004  
 Phone (202) 204-3500  
 Fax (202) 204-3501  
 wfore@constantinecannon.com

*Proposed Interim Co-Lead Counsel*

Kenneth J. Rubin (*pro hac vice*)  
 Timothy B. McGranor (*pro hac vice*)  
 Kara M. Mundy (*pro hac vice*)  
 VORYS, SATER, SEYMOUR AND  
 PEASE LLP  
 52 East Gay Street  
 Columbus, Ohio 43215  
 Phone (614) 464-6400  
 Fax (614) 719-4796  
 kjrubin@vorys.com  
 tbmcgranor@vorys.com  
 kmmundy@vorys.com

Thomas N. McCormick (*pro hac vice*)  
 VORYS, SATER, SEYMOUR AND  
 PEASE LLP  
 4675 MacArthur Court, Suite 700  
 Newport Beach, California 92660  
 Phone (949) 526-7903 | Fax (949) 383-2384  
 tnmcormick@vorys.com

*Proposed Interim Executive Committee  
 Member*

*s/ Blake Marks-Dias*  
 Blake Marks-Dias, WSBA No. 28169  
 Eric A. Lindberg, WSBA No. 43593  
 CORR CRONIN LLP  
 1015 Second Avenue, Floor 10  
 Seattle, WA 98104  
 (206) 625-8600 Phone  
 (206) 625-0900 Fax  
 bmarksdias@corrchronin.com  
 elindberg@corrchronin.com

Kristen Ward Broz  
 FOX ROTHSCHILD LLP  
 2020 K. St. NW, Ste. 500  
 Washington, DC 20006  
 Telephone (202) 794-1220  
 Fax (202) 461-3102  
 kbroz@foxrothschild.com

Charles B. Casper (*pro hac vice*)  
 MONTGOMERY McCracken Walker  
 & Rhoads LLP  
 1735 Market Street, 21st Floor  
 Philadelphia, PA 19103  
 Telephone (215) 772-1500  
 ccasper@mmwr.com

*Attorneys for Defendant Valve Corporation*

STIPULATED MOTION AND ORDER RE: MOTIONS TO  
 SEAL – 4

**CORR CRONIN LLP**  
 1015 Second Avenue, Floor 10  
 Seattle, Washington 98104-1001  
 Tel (206) 625-8600  
 Fax (206) 625-0900

1 PURSUANT TO STIPULATION, IT IS SO ORDERED pursuant to the parties'  
2 stipulation (**Dkt. No. 293**).

3 DATED this 28th day of June 2024.

4 

5  
6 

---

John C. Coughenour  
7 UNITED STATES DISTRICT JUDGE  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

STIPULATED MOTION AND ORDER RE: MOTIONS TO  
SEAL – 5

**CORR CRONIN LLP**  
1015 Second Avenue, Floor 10  
Seattle, Washington 98104-1001  
Tel (206) 625-8600  
Fax (206) 625-0900